



# Knuckles Komosinski & Manfro LLP

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May 27, 2020

**VIA ECF**

Judge Sean H. Lane  
U.S. Bankruptcy Court  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601

Re: In re: Michele Foley  
Case No. 19-23257-shl

Dear Judge Lane:

This office represents SN Servicing Corporation, as servicer for MCH Sub I, LLC, a secured creditor, in the above-referenced matter. Please allow this letter to serve as a status update in this matter.

On August 16, 2019, our office filed a Motion for Relief from Stay with In Rem Relief (ECF No. 15). At the initial hearing, monthly adequate protection payments in the amount of \$4,352.74 were to begin October 1, 2019 and continue monthly thereafter. An Order directing same was entered on September 19, 2019 (ECF No. 20). Further, Debtor's counsel was to proceed with efforts to void judgment liens and to then proceed with the sale of the property.

At the December 11, 2019 status hearing, we advised that the October adequate protection payment was received, but November and December payments were still outstanding. On February 12, 2020, a hearing was held whereby Debtor advised will be converting to Chapter 11. An Order Converting Case was entered.

As of the filing of this letter, SN has advised that the Debtor remains due for adequate protection payments from November 2019 up to and including May 2020.

If there are any questions, please do not hesitate to contact our office.

Respectfully,

**Knuckles, Komosinski & Manfro, LLP**

/s/ Ernest A. Yazzetti, Jr., Esq.

Ernest A. Yazzetti, Jr., Esq.

Counsel for SN Servicing Corporation, as servicer  
for MCH Sub I, LLC

cc: All Counsel – via ECF